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November 14, 2007

Marlene H. Dortch
Secretary
Federal Communications Commission
236 Massachusetts Avenue, NE
Suite 110
Washington, D.C. 20002

FILED/ACCEPTED

NOV 14 2007

Federal Communications Commission
Office of the Secretary

RE: Answers to Request for Admissions, Keanan Kintzel; EB Docket No. 07-197

Dear Madame Secretary:

Enclosed for filing on behalf of parties Kurtis J. Kintzel, Keanan Kintzel, and all other Entities by which they do business before the Federal Communications Commission, is the original and 6 copies of the Answers to the Enforcement Bureau's Request for Admission of Facts and Genuineness of Documents to Keanan Kintzel in the above-referenced matter.

Sincerely,

Catherine Park, Esq.

Catherine Park, Esq.

Enclosures: Original + 6 Copies

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**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)

Kurtis J. Kintzel, Keanan Kintzel, and all)
Entities by which they do business before the)
Federal Communications Commission)

Resellers of Telecommunications Services)

To: Presiding Officer, Richard L. Sippel)
(Chief ALJ))

EB Docket No. 07-197

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Federal Communications Commission
Office of the Secretary

**ANSWERS TO ENFORCEMENT BUREAU'S REQUEST FOR ADMISSION OF FACTS
AND GENUINENESS OF DOCUMENTS TO KEANAN KINTZEL**

The party, by his undersigned counsel, hereby answers the Request for Admissions and Genuineness of Documents propounded by the Enforcement Bureau as follows:

- a. The information supplied in these Answers is true to the best of the party's knowledge, information, and belief;
- b. The word usage and sentence structure may be those of the attorney who in fact prepared these Answers and does not purport to be that of the executing party; and
- c. Discovery is not complete; the party reserves the right to supplement its Answers if additional information comes to its attention.

Answers

1. "BOI entered into a consent decree with the Commission dated on or about February 13, 2004 (the "Consent Decree") in connection with a proceeding under EB Docket No. 03-85."

Answer: Objection; the question is improper because directed to Keanan Kintzel individually, although the Order to Show Cause does not allege any facts that would justify piercing the corporate veil under existing law, or that would otherwise make the question proper. The question should be directed to the corporation.

2. "Buzz entered into the Consent Decree."

Answer: Objection; the question is improper because directed to Keanan Kintzel individually, although the Order to Show Cause does not allege any facts that would justify piercing the corporate veil under existing law, or that would otherwise make the question proper. The question should be directed to the corporation.

3. "The Companies are signatories to the Consent Decree."

Answer: Objection; the question is improper because directed to Keanan Kintzel individually, although the Order to Show Cause does not allege any facts that would justify piercing the corporate veil under existing law, or that would otherwise make the question proper. The question should be directed to the corporations.

4. "Kurtis J. Kintzel is BOI's Chairman of the Board."

Answer: Objection; the question is improper because directed to Keanan Kintzel individually, although the Order to Show Cause does not allege any facts that would justify piercing the corporate veil under existing law, or that would otherwise make the question proper. The question should be directed to the corporation.

5. "Kurtis J. Kintzel has been Chairman of the Board of BOI from February 11, 2004 through the present."

Answer: Objection; the question is improper because directed to Keanan Kintzel individually, although the Order to Show Cause does not allege any facts that would justify piercing the corporate veil under existing law, or that would otherwise make the question proper. The question should be directed to the corporation.

6. "Kurtis J. Kintzel is BOI's president."

Answer: Objection; the question is improper because directed to Keanan Kintzel individually, although the Order to Show Cause does not allege any facts that would justify piercing the corporate veil under existing law, or that would otherwise make the question proper. The question should be directed to the corporation.

7. "Kurtis J. Kintzel has been BOI's president during the period February 11, 2004 through the present."

Answer: Objection; the question is improper because directed to Keanan Kintzel individually, although the Order to Show Cause does not allege any facts that would justify piercing the corporate veil under existing law, or that would otherwise make the question proper. The question should be directed to the corporation.

8. "Kurtis J. Kintzel holds a 72 percent equity interest in BOI."

Answer: Objection; the question is improper because directed to Keanan Kintzel individually, although the Order to Show Cause does not allege any facts that would justify piercing the corporate veil under existing law, or that would otherwise make the question proper. The question should be directed to the corporation.

9. "Kurtis J. Kintzel has held a majority equity interest in BOI from February 11, 2004 through the present."

Answer: Objection; the question is improper because directed to Keanan Kintzel individually, although the Order to Show Cause does not allege any facts that would justify piercing the corporate veil under existing law, or that would otherwise make the question proper. The question should be directed to the corporation.

10. "You are BOI's Secretary/Treasurer."

Answer: Objection; the question is improper because directed to Keanan Kintzel individually, although the Order to Show Cause does not allege any facts that would justify piercing the corporate veil under existing law, or that would otherwise make the question proper. The question should be directed to the corporation.

11. "You have been been BOI's Secretary/Treasurer during the period February 11, 2004 through the present."

Answer: Objection; the question is improper because directed to Keanan Kintzel individually, although the Order to Show Cause does not allege any facts that would justify piercing the corporate veil under existing law, or that would otherwise make the question proper. The question should be directed to the corporation.

12. "You are a director of BOI."

Answer: Objection; the question is improper because directed to Keanan Kintzel individually, although the Order to Show Cause does not allege any facts that would justify piercing the corporate veil under existing law, or that would otherwise make the question proper. The question should be directed to the corporation.

13. *"You have been a director of BOI during the period February 11, 2004 through the present."*

Answer: Objection; the question is improper because directed to Keanan Kintzel individually, although the Order to Show Cause does not allege any facts that would justify piercing the corporate veil under existing law, or that would otherwise make the question proper. The question should be directed to the corporation.

14. *"You hold a 26 percent equity interest in BOI."*

Answer: Objection; the question is improper because directed to Keanan Kintzel individually, although the Order to Show Cause does not allege any facts that would justify piercing the corporate veil under existing law, or that would otherwise make the question proper. The question should be directed to the corporation.

15. *"You have held a minority equity interest in BOI from February 11, 2004 through the present."*

Answer: Objection; the question is improper because directed to Keanan Kintzel individually, although the Order to Show Cause does not allege any facts that would justify piercing the corporate veil under existing law, or that would otherwise make the question proper. The question should be directed to the corporation.

16. *"Kurtis J. Kintzel is Buzz's Chairman of the Board."*

Answer: Objection; the question is improper because directed to Keanan Kintzel individually, although the Order to Show Cause does not allege any facts that would justify piercing the corporate veil under existing law, or that would otherwise make the question proper. The question should be directed to the corporation.

17. "Kurtis J. Kintzel has been Chairman of the Board of Buzz Telecom from February 11, 2004 through the present."

Answer: Objection; the question is improper because directed to Keanan Kintzel individually, although the Order to Show Cause does not allege any facts that would justify piercing the corporate veil under existing law, or that would otherwise make the question proper. The question should be directed to the corporation.

18. "Kurtis J. Kintzel has been President of Buzz during the period February 11, 2004 through the present."

Answer: Objection; the question is improper because directed to Keanan Kintzel individually, although the Order to Show Cause does not allege any facts that would justify piercing the corporate veil under existing law, or that would otherwise make the question proper. The question should be directed to the corporation.

19. "Kurtis Kintzel is a director of Buzz."

Answer: Objection; the question is improper because directed to Keanan Kintzel individually, although the Order to Show Cause does not allege any facts that would justify piercing the corporate veil under existing law, or that would otherwise make the question proper. The question should be directed to the corporation.

20. "Kurtis Kintzel has been a director of Buzz during the period February 11, 2004 through the present."

Answer: Objection; the question is improper because directed to Keanan Kintzel individually, although the Order to Show Cause does not allege any facts that would justify piercing the corporate veil under existing law, or that would otherwise make the question proper. The question should be directed to the corporation.

21. "Kurtis J. Kintzel holds a 72 percent equity interest in Buzz."

Answer: Objection; the question is improper because directed to Keanan Kintzel individually, although the Order to Show Cause does not allege any facts that would justify piercing the corporate veil under existing law, or that would otherwise make the question proper. The question should be directed to the corporation.

22. "Kurtis J. Kintzel has held a majority equity interest in Buzz from February 11, 2004 through the present."

Answer: Objection; the question is improper because directed to Keanan Kintzel individually, although the Order to Show Cause does not allege any facts that would justify piercing the corporate veil under existing law, or that would otherwise make the question proper. The question should be directed to the corporation.

23. "You are Buzz's Secretary."

Answer: Objection; the question is improper because directed to Keanan Kintzel individually, although the Order to Show Cause does not allege any facts that would justify piercing the corporate veil under existing law, or that would otherwise make the question proper. The question should be directed to the corporation.

24. "You have been Secretary of Buzz Telecom from February 11, 2004 through the present."

Answer: Objection; the question is improper because directed to Keanan Kintzel individually, although the Order to Show Cause does not allege any facts that would justify piercing the corporate veil under existing law, or that would otherwise make the question proper. The question should be directed to the corporation.

25. "You are a director of Buzz."

Answer: Objection; the question is improper because directed to Keanan Kintzel individually, although the Order to Show Cause does not allege any facts that would justify piercing the corporate veil under existing law, or that would otherwise make the question proper. The question should be directed to the corporation.

26. "You have been a director of Buzz during the period February 11, 2004 through the present."

Answer: Objection; the question is improper because directed to Keanan Kintzel individually, although the Order to Show Cause does not allege any facts that would justify piercing the corporate veil under existing law, or that would otherwise make the question proper. The question should be directed to the corporation.

27. "You hold a 26 percent equity interest in Buzz."

Answer: Objection; the question is improper because directed to Keanan Kintzel individually, although the Order to Show Cause does not allege any facts that would justify piercing the corporate veil under existing law, or that would otherwise make the question proper. The question should be directed to the corporation.

28. "You have held a minority equity interest in Buzz from February 11, 2004 through the present."

Answer: Objection; the question is improper because directed to Keanan Kintzel individually, although the Order to Show Cause does not allege any facts that would justify piercing the corporate veil under existing law, or that would otherwise make the question proper. The question should be directed to the corporation.

29. "Kurtis J. Kintzel holds a 72 percent equity interest in Avatar."

Answer: Objection; the question is improper because directed to Keanan Kintzel individually, although the Order to Show Cause does not allege any facts that would justify piercing the corporate veil under existing law, or that would otherwise make the question proper. The question should be directed to the corporation.

30. "Kurtis J. Kintzel has held a majority equity interest in Avatar from February 11, 2004 through the present."

Answer: Objection; the question is improper because directed to Keanan Kintzel individually, although the Order to Show Cause does not allege any facts that would justify piercing the corporate veil under existing law, or that would otherwise make the question proper. The question should be directed to the corporation.

31. "You are a director of Avatar."

Answer: Objection; the question is improper because directed to Keanan Kintzel individually, although the Order to Show Cause does not allege any facts that would justify piercing the corporate veil under existing law, or that would otherwise make the question proper. The question should be directed to the corporation.

32. "You have been a director of Avatar during the period February 11, 2004 through the present."

Answer: Objection; the question is improper because directed to Keanan Kintzel individually, although the Order to Show Cause does not allege any facts that would justify piercing the corporate veil under existing law, or that would otherwise make the question proper. The question should be directed to the corporation.

33. "You hold a 26 percent equity interest in Avatar."

Answer: *Objection; the question is improper because directed to Keanan Kintzel* individually, although the Order to Show Cause does not allege any facts that would justify piercing the corporate veil under existing law, or that would otherwise make the question proper. The question should be directed to the corporation.

34. "You have held a minority equity interest in Avatar from February 11, 2004 through the present."

Answer: Objection; the question is improper because directed to Keanan Kintzel individually, although the Order to Show Cause does not allege any facts that would justify piercing the corporate veil under existing law, or that would otherwise make the question proper. The question should be directed to the corporation.

35. "You and Kurtis J. Kintzel are brothers."

Answer: Objection; the question is irrelevant. The Order to Show Cause does not allege any facts that would justify piercing the corporate veil under existing law, or that would otherwise make the question proper.

36. "Kurtis J. Kintzel is responsible for overseeing the financial management of BOI."

Answer: Objection; the question is improper because directed to Keanan Kintzel individually, although the Order to Show Cause does not allege any facts that would justify piercing the corporate veil under existing law, or that would otherwise make the question proper. The question should be directed to the corporation.

37. "Kurtis J. Kintzel has been responsible for overseeing the financial management of BOI during the period February 11, 2004 through the present."

Answer: Objection; the question is improper because directed to Keanan Kintzel individually, although the Order to Show Cause does not allege any facts that would justify piercing the corporate veil under existing law, or that would otherwise make the question proper. The question should be directed to the corporation.

38. "You are responsible for overseeing the day-to-day activities of BOI."

Answer: Objection; the question is improper because directed to Keanan Kintzel individually, although the Order to Show Cause does not allege any facts that would justify piercing the corporate veil under existing law, or that would otherwise make the question proper. The question should be directed to the corporation.

39. "You have been responsible for overseeing the day-to-day activities of BOI during the period February 11, 2004 through November 2006."

Answer: Objection; the question is improper because directed to Keanan Kintzel individually, although the Order to Show Cause does not allege any facts that would justify piercing the corporate veil under existing law, or that would otherwise make the question proper. The question should be directed to the corporation.

40. "You have been responsible for overseeing the day-to-day activities of BOI during the period December 2006 through the present."

Answer: Objection; the question is improper because directed to Keanan Kintzel individually, although the Order to Show Cause does not allege any facts that would justify piercing the corporate veil under existing law, or that would otherwise make the question proper. The question should be directed to the corporation.

41. "Kurtis J. Kintzel is responsible for overseeing the financial management of Buzz."

Answer: Objection; the question is improper because directed to Keanan Kintzel individually, although the Order to Show Cause does not allege any facts that would justify piercing the corporate veil under existing law, or that would otherwise make the question proper. The question should be directed to the corporation.

42. "Kurtis J. Kintzel has been responsible for overseeing the financial management of Buzz during the period February 11, 2004 through the present."

Answer: Objection; the question is improper because directed to Keanan Kintzel individually, although the Order to Show Cause does not allege any facts that would justify piercing the corporate veil under existing law, or that would otherwise make the question proper. The question should be directed to the corporation.

43. "Kurtis J. Kintzel is responsible for overseeing the regulatory compliance of Buzz."

Answer: Objection; the question is improper because directed to Keanan Kintzel individually, although the Order to Show Cause does not allege any facts that would justify piercing the corporate veil under existing law, or that would otherwise make the question proper. The question should be directed to the corporation.

44. "Kurtis J. Kintzel has been responsible for overseeing the regulatory compliance of Buzz during the period February 11, 2004 through the present."

Answer: Objection; the question is improper because directed to Keanan Kintzel individually, although the Order to Show Cause does not allege any facts that would justify piercing the corporate veil under existing law, or that would otherwise make the question proper. The question should be directed to the corporation.

45. "Kurtis J. Kintzel is responsible for overseeing the regulatory compliance of Buzz."

Answer: Objection; the question is improper because directed to Keanan Kintzel individually, although the Order to Show Cause does not allege any facts that would justify piercing the corporate veil under existing law, or that would otherwise make the question proper. The question should be directed to the corporation.

46. "Kurtis J. Kintzel has been responsible for overseeing the regulatory compliance of Buzz during the period February 11, 2004 through the present."

Answer: Objection; the question is improper because directed to Keanan Kintzel individually, although the Order to Show Cause does not allege any facts that would justify piercing the corporate veil under existing law, or that would otherwise make the question proper. The question should be directed to the corporation.

47. "You are responsible for overseeing the day-to-day activities of Buzz."

Answer: Objection; the question is improper because directed to Keanan Kintzel individually, although the Order to Show Cause does not allege any facts that would justify piercing the corporate veil under existing law, or that would otherwise make the question proper. The question should be directed to the corporation.

48. "You have been responsible for overseeing the day-to-day activities of Buzz during the period February 11, 2004 through November 2006."

Answer: Objection; the question is improper because directed to Keanan Kintzel individually, although the Order to Show Cause does not allege any facts that would justify piercing the corporate veil under existing law, or that would otherwise make the question proper. The question should be directed to the corporation.

49. "You have been responsible for overseeing the day-to-day activities of Buzz during the period December 2006 through the present."

Answer: Objection; the question is improper because directed to Keanan Kintzel individually, although the Order to Show Cause does not allege any facts that would justify piercing the corporate veil under existing law, or that would otherwise make the question proper. The question should be directed to the corporation.

50. "Kurtis J. Kintzel had to approve all scripts used by telemarketers to market Buzz during the period February 11, 2004 through November 2006."

Answer: Objection; the question is improper because directed to Keanan Kintzel individually, although the Order to Show Cause does not allege any facts that would justify piercing the corporate veil under existing law, or that would otherwise make the question proper. The question should be directed to the corporation.

51. "Kurtis J. Kintzel has had to approve all scripts used by telemarketers to market Buzz during the period December 2006 through the present."

Answer: Objection; the question is improper because directed to Keanan Kintzel individually, although the Order to Show Cause does not allege any facts that would justify piercing the corporate veil under existing law, or that would otherwise make the question proper. The question should be directed to the corporation.

52. "You reviewed all scripts used by telemarketers to market Buzz during the period February 11, 2004 through November 2006."

Answer: Objection; the question is improper because directed to Keanan Kintzel individually, although the Order to Show Cause does not allege any facts that would justify

piercing the corporate veil under existing law, or that would otherwise make the question proper.

The question should be directed to the corporation.

53. "You have reviewed all scripts used by telemarketers to market Buzz during the period December 2006 through the present."

Answer: Objection; the question is improper because directed to Keanan Kintzel individually, although the Order to Show Cause does not allege any facts that would justify piercing the corporate veil under existing law, or that would otherwise make the question proper. The question should be directed to the corporation.

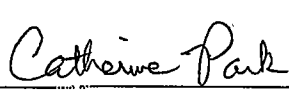
SWORN STATEMENT

I hereby declare under penalty of perjury that the information supplied in the foregoing Answers is true to the best of my knowledge, information, and belief. The word choice and sentence structure may be those of the attorney and does not purport to be that of the executing parties. Discovery is not complete; the parties reserve the right to supplement their Answers if additional information comes to their attention.



NOV 9, 2007

Keanan Kintzel

 11/11/07

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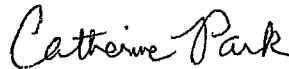
I HEREBY CERTIFY that a true and correct copy of the foregoing was sent for filing on this 14th day of November 2007, by hand delivery, to the following:

Marlene H. Dortch
Secretary
Federal Communications Commission
236 Massachusetts Avenue, NE
Suite 110
Washington, D.C. 20002

And served by U.S. Mail, First Class, on the following:

Richard L. Sippel, Chief Administrative Law Judge
Federal Communications Commission
445 12th Street, SW, Room 1-C861
Washington, D.C. 20554

Hillary DeNigro, Chief
Michele Levy Berlove, Attorney
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